

HQUSACE
Attn: P&G Revision
CECW-ZA
441 G Street, NW
Washington, DC 20314-1000

June 2, 2008

Ref: HQUSACE request for suggestions to revise Part I of Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies as printed in the 5-8-08 Federal Register at page 26086.

The following comments, in response to above referenced solicitation, are submitted on behalf of AR Wildlife Federation, a state affiliate of National Wildlife Federation by:

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We propose the following language modification to P&G's as mandated by Sec. 2031 (PL 110-114). The following comments are listed in alignment with the Public Law.

(a) National Water Resource Planning Policy national priority, economic development, and environmental protection should be modified away from National Economic Development (NED) language in the current Federal Objective to read [The Federal Objective is to manage water resources to produce a multi-purpose mix of aquatic related outputs within a region or watershed so as to maximize sustainable net public benefits through avoiding unwise use of floodplains, and implementing regional and watershed strategies that protect, restore and enhance natural system functions through a systematic study process that considers public and expert participation].

Reason: Sec. 2031(a) changes Corps current Policy that NED trumps all other project purposes. 2031(a) expands equal footing to include floodplain protection, mitigation, protecting natural ecosystem functions and other purposes. Corps studies currently decide and limits project alternatives under a NED concept based on quantifying national output of goods and services, solely using monetary units, which fails to recognize that science, technology, and the scientific field of economics has advanced and developed over the past 25 years to measure values produced by natural functioning systems not recognized under the current NED marketable goods and services concept. Protecting ecosystem functions and ecosystem restoration is now a national priority. Sec. 2031 mandate eliminates Corps current P&G practice than limit the preferred alternative to "NED trumps all" benefit/cost accounting, thus should be modified in alignment with our proposed Federal Objective language [] in the above (a). This change will make possible

attaining provisions at (b)(3)(A)-(F), otherwise meeting these provisions is not realistic under the current NED trumps all concept? NED fails to recognize benefits from self-maintained healthy ecosystem functions that are attained at no market quantifiable cost to the public.

(2) This Sec. 2031 (a)(2) provision is consistent with Ex Orders 11988 and 11990 regarding floodplain and wetland management, and should be reproduced intact in the P&G's with clear language that [permitting projects within the 100 year Base Floodplain, that fail to protect or enhance floodplain functions, wetlands, natural ecosystem functions or involve levees with an unacceptable rating will be disallowed, except in situations where high quality evidence and analysis firmly supports that the proposed action is floodplain dependent and that no other reasonable alternative solution located outside the Base Floodplain is available]. This language is consistent with the above Ex Orders, Clean Water Act, Federal Emergency Management Agency Flood Insurance Rate Mapping, 44 CFR 9 Floodplain Management and the NEPA Process as mandated by National Environmental Policy Act. This proposed language is mandated by Sec. 2031.

(b)(3) CONSIDERATIONS: The language in (A) through (F) Sec. 2031 should be P&G reproduced in their entirety, and we propose adding to Evaluation of Alternative Plans and criteria relied upon the following.

Criteria: Information relied upon to analyze and justify public benefits must be high quality, accurate, clear, complete and unbiased, and must be capable of being reproduced in accordance with commonly accepted scientific, financial and statistical standards, and transparent in terms of data and methods of analysis, that it would be feasible for a replication to be conducted.

Reason: The above Criteria would clarify, and incorporate in P&G's water resource planning, provisions of PL 106-554, Sec. 515, referred to as the Data/Information Quality Act and implemented 2-10-03 by DOD. The proposed language is taken directly from DQA and is necessary in order to meet the assessment/evaluation mandate of (A) through (F). Moreover, including such Criteria in the P&G's is also necessary for building the functional information base to quantify cost/benefits, and to accomplish (a)(3) "protect and restore the functions of natural systems and mitigating unavoidable damage to natural systems". It will move Corps studies towards accuracy and away from their current "cook the books"/build an analysis to justify already predetermined decisions.

On behalf of AR Wildlife Federation, we appreciate this opportunity to offer the above comments on Phase I of modifying the 1983 Corps Planning Guidelines as mandated by Section 2031 of WRDA 2007.

Respectfully Submitted,
(Signed)
Jim Wood, Ex Board
AR Wildlife Federation
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